

Neel Chatterjee (SBN 173985)
nchatterjee@goodwinlaw.com

James Lin (SBN 310440)
jlin@goodwinlaw.com

GOODWIN PROCTER LLP
135 Commonwealth Drive
Menlo Park, California 94025
Tel.: +1 650 752 3100
Fax.: +1 650 853 1038

Brett Schuman (SBN 189247)
bschuman@goodwinlaw.com

Shane Brun (SBN 179079)
sbrun@goodwinlaw.com

Rachel M. Walsh (SBN 250568)
rwalsh@goodwinlaw.com

Hayes P. Hyde (SBN 308031)
hhyde@goodwinlaw.com

GOODWIN PROCTER LLP
Three Embarcadero Center
San Francisco, California 94111
Tel.: +1 415 733 6000
Fax.: +1 415 677 9041

Hong-An Vu (SBN 266268)
hvu@goodwinlaw.com

GOODWIN PROCTER LLP
601 S. Figueroa Street, 41st Floor
Los Angeles, California 90017
Tel.: +1 213 426 2500
Fax.: +1 213 623 1673

Attorneys for Defendant: Otto Trucking LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF JAMES LIN IN
SUPPORT OF DEFENDANT OTTO
TRUCKING'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF ITS MOTION TO
COMPEL**

Courtroom: F-15th Floor
Magistrate Judge: Hon. Jacqueline Scott Corley
Trial: October 10, 2017

Filed/Lodged Concurrently with:

1. Admin. Mtn. to File Documents Under Seal
2. [Proposed] Order
3. Redacted/Unredacted Versions
4. Proof of Service

I, James Lin, declare as follows:

1. I am an attorney at the law firm of Goodwin Procter LLP, counsel of record for Defendant Otto Trucking LLC (“Otto Trucking”). I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Defendant Otto Trucking’s Administrative Motion to File Under Seal Portions of its Motion to Compel (the “Administrative Motion”).

2. I have reviewed the following documents and confirmed that only the portions identified below merit provisional sealing:

Document	Portions to Be Filed Under Seal
Otto Trucking’s Letter Brief re Motion to Compel	Highlighted Portions
Exhibit 1 to Boock Declaration – Email from Todd Boock dated August 31, 2017, 10:40 A.M.	Highlighted Portions
Exhibit 2 to Boock Declaration – Email from Todd Boock dated August 31, 2017, 1:09 P.M.	Highlighted Portions
Exhibit 7 to Jennings Declaration – Document Bates-stamped WAYMO-UBER-00084602 – 00084608	Entire Document
Exhibit 9 to Jennings Declaration – Document Bates-stamped WAYMO-UBER-00006391 – 00006392	Entire Document
Exhibit 10 to Jennings Declaration – Excerpts of Deposition Transcript of Pierre-Yves Droz dated August 22, 2017	Entire Document

3. The highlighted portions of the Letter Brief, the highlighted portions of Exhibits 1 and 2 to the Boock Declaration, and the entirety of Exhibits 7, 9, and 10 to the Jennings Declaration contain information that Waymo has designated “Confidential” or “Highly

1 Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order in this case. Otto Trucking
2 states no position about whether the confidentiality designations are appropriate.

3 4. Otto Trucking anticipates that Waymo will file any necessary declarations to seal
4 the above information pursuant to Local Rule 79-5.

5 5. Otto Trucking’s request to seal is narrowly tailored to those portions of the Motion
6 to Compel and its supporting documents that merit sealing.

7 I declare under penalty of perjury under the laws of the United States that the foregoing is
8 true and correct. Executed this 31st day of August, 2017 in Menlo Park, California.

9
10 /s/ James Lin
JAMES LIN